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**THE UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON**

FILED 31 OCT '17 12:46 USDC-ORF

**ANDREA OLSON  
Plaintiff**

**Case No. 3:15-cv-02216-HZ**

**2nd UNOPPOSED MOTION FOR  
EXTENSION OF DISCOVERY  
v. DEADLINE**

**V.**

**UNITED STATES OF AMERICA, by  
and through the Department of Energy  
and Bonneville Power Administration;  
and JAMES RICHARD PERRY,  
Secretary of the Department of Energy,  
Defendants**

Andrea Olson, the Plaintiff, respectfully moves for an additional thirty day extension to the discovery deadline, from November 1, 2017 to December 1, 2017. One of Ms. Olson's POA's, Dana Hoffman, acting on Ms. Olson's behalf has conferred with James E. Cox, Jr., Assistant United States Attorney for the Federal Defendants. Mr. James E. Cox, Jr., has informed the Plaintiff and her POA that the Federal Defendants do not oppose this motion.

Attorney Ivan Resendiz-Gutierrez filed an amended complaint in March 2017 (ECF 56) on behalf of Ms. Olson via a limited /special court order (ECF 53) which added the United States of America and the Secretary of Energy as Defendants in this case based on violations of the Americans with Disabilities Act and Family Medical Leave Act. In July, 2017, the Court set a case schedule that included a discovery cut-off of October 2, 2017. (ECF 87)

However James E. Cox, Jr. counsel for Defendants was on a lengthy paternity leave until August 26, 2017. Because of this absence, Mr. Cox was unable to complete the necessary preparation to hold Plaintiff/ Ms. Olson's deposition in the case in September 2017, as contemplated by the current case schedule. Both the Plaintiff and Defendants agreed upon a 30 day extension. Mr.

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Cox filed the motion on October 2, 2017 (ECF 88) and that motion was granted on October 3, 2017 (ECF 90) putting the new deadline being due on November 1, 2017.

During that time Ms Olson's POA/ Ms. Hoffman had to undergo an unexpected breast cancer surgery. Due to the unexpected circumstances, Mr Cox was unable to complete the deposition on Ms. Olson because of these unforeseen set of circumstances.


Plaintiff Ms. Olson and one of her POA's Ms. Hoffman after conferring with the Defendants' Attorney Mr. Cox, were able to reach an agreement to a deposition date. An additional 30 day extension of the current discovery deadline to December 1, 2017 will help allow this disposition to take place.

Furthermore, an extension would not result in any delay in trial or other pre-trial deadlines, as the deadline for dispositive motions is not until December 4, 2017. (ECF 87) With the exception of the Expert Disclosure due on November 5, 2017 which both parties have agreed upon would be due the same date December 1, 2017 as the discovery date that we are asking for in this motion, therefore there still would not be a delay on any other deadlines that have been scheduled.

**WHEREFORE**, Ms. Olson respectfully requests that the Court grant this 2nd unopposed motion to extend the discovery deadline in this case from November 1, 2017 to December 1, 2017.

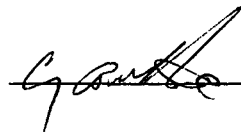
Dated this 31st day of October 2017.

Respectfully Submitted,



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Plaintiff /Andrea Olson  
3404 SW Comus St  
Portland, Oregon, 97219  
(503) 452-8888  
andrea.olson8888@gmail.com



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Craig Butler/POA for Plaintiff Ms. Olson

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**IN THE DISTRICT COURT OF THE STATE OF OREGON  
FOR THE COUNTY OF MULTNOMAH**

FILED 31 OCT '17 12:46 USDC-ORP

**Case No: 3:15-cv-02216-HZ**

**ANDREA OLSON  
PLAINTIFF**

**V.**

**CERTIFICATE OF DOCUMENT  
PREPARATION AND  
FILING OF COURT DOCUMENTS**

**UNITED STATES OF AMERICA, by  
and through the Department of Energy  
and Bonneville Power Administration;  
and JAMES RICHARD PERRY,  
Secretary of the Department of Energy,  
DEFENDANTS**

You are required to truthfully complete this certificate regarding the documents you are filing with the court.

Check all boxes and complete all blanks that apply:

☒ I selected these documents for myself, and I had assistance filling them out with my POA without paid assistance.

☐ I paid or will pay money to \_\_\_\_\_ for assistance in preparing these documents.

☒ The documents referred to are entitled: I, Andrea Olson, the Plaintiff to the above case suffer from a mental illness. I do not have an attorney. I have two POA's to assist me with all my needs. I am filing (3) documents with the District Court Of Oregon.

- 1) 2<sup>nd</sup> Unopposed Motion For an Extension to File Discovery v. Deadline
- 2) Unopposed Motion For an Extension to File Expert Disclosure v. Deadline
- 3) Medical documentation


I, Andrea Olson, the Plaintiff to the above case have assisted my POA's in the contents that I wanted placed in the first two court documents. Neither of my POA's are entitled to payment for their

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assistance. Neither of my POA's are Attorneys. Neither of my POA's have offered legal advice.

As this court has repeatedly denied me assistance for the purposes of reasonable accommodation as well as indigence, I am submitting a third document from the treating medical provider detailing my current mental health status for the record. The court and opposing counsel are both privately in possession of additional medical documentation from two additional medical providers (that the court appears to have ignored).

Dated: October 31, 2017

Signature: 

3404 SW COMUS ST PORTLAND OR 97219  
Address or Contact Address City, State, Zip

503-452-8888  
Telephone or Contact Telephone

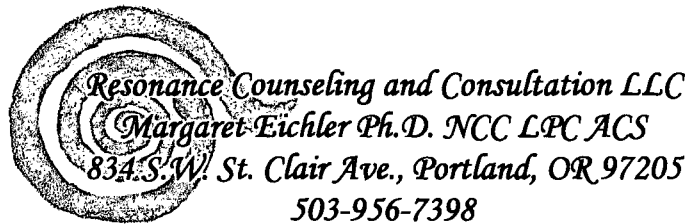
POA's Name(s) Craig Butler and Dana Hoffman

POA's Name Filing these documents on my behalf: Craig Butler

POA's Name Assisting me with filling out the two stated documents: Dana Hoffman

My POA's telephone number: 318-533-2818

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October 8<sup>th</sup> 2017

Re: Andrea Olson DOB 8/22/1964

First seen December 15<sup>th</sup> 2015 for treatment related to diagnostics below.

I continue to see Andrea on a weekly basis except for time when she was in residential and outpatient treatment. Her mental and emotional health continues to be severe and she is limited in her ability to navigate the basic daily requirements of functioning in order to care for herself. Her cognitive functioning is impacted by her intense experiences of interpersonal distrust and paranoia related to seeking treatment and her navigating her ongoing legal process. She is unable to regulate her emotions of both anger and crying in relational interactions. Client wears hearing aids and reports congenital legal deafness.

F34.1 Persistent depressive disorder, severe, late onset, With intermittent major depressive episodes, with current episode severe with psychotic features, paranoia

F43.10 Posttraumatic stress disorder

Z56.9 Other problem related to employment

Termination of fulltime employment from professional career

Z65.3 Problems related to other legal circumstances

Ongoing legal processes, with stressful and overwhelming circumstances

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Z60.5 Target of adverse discrimination or persecution

Current and lifelong impact of discrimination and insidious trauma due to  
"cultural ableism" because of her atypical hearing (lack of/ legal deafness))  
present since birth.

GAF 45

A handwritten signature in black ink, appearing to read "Marg Eichler PhD LPC". The signature is fluid and cursive, with the letters "M", "E", and "P" being particularly prominent.

Margaret Eichler PhD LPC NCC ACS  
Individual, Child and Family Therapist  
503-956-7398  
dr-meichler.com  
resonancecounseling@msn.com

Licensed Professional Counselor Oregon #C2058  
Nationally Certified Counselor #47334  
NPI number #1477703452  
Nationally Approved Clinical Supervisor #ACS00851  
EIN # 87-0792980

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**Providence St. Vincent Hospital**

Providence St. Vincent Medical Center  
9205 SW Barnes Road, Suite 333  
Portland, OR 97225

Tel: 503.216.3591  
Fax: 503.216.3583

October 28, 2016

Regarding Andrea Olson vs MBO Partners, INC  
3: 15-CV-02216-HZ

To Whom It May Concern:

I am the treating physician for Andrea Olson. She has been hospitalized at Providence St. Vincent Hospital since October 13, 2016.

Because of her mental health conditions she is unable to participate in proceedings before the court. I do not have an estimate as to when she will be able to proceed. Please excuse her from the proceedings. Her absence from the proceedings is medically necessary.

My understanding is that she has been representing herself in court. Because of the degree of distress she is experiencing it is my medical opinion that she is unable to continue to do so. She has asked that I request that the court provide her with legal counsel to assist her. I do think that this request is appropriate, and ask that the court provide her with legal counsel to assist in the proceedings.

I do feel that the absence from the proceedings and the assistance of legal counsel are medically necessary.

Sincerely,

A handwritten signature in black ink that reads "J Reuther MD".

James Reuther MD

Providence St. Vincent Medical Center  
9450 S.W. Barnes Road, Suite 200  
Portland, OR 97225  
t: 503.216.2025  
f: 503.216.5529  
www.providence.org/oregon

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## Outpatient Behavioral Health Services

Mr. Ivan Resendiz- Guterrez

Miller Nash, Graham and & Dunn

Via fax: 503-224-0155



December 19, 2016

Re: Andrea Olson

DOB: 8/22/1964

Dear Mr. Resendiz-Guterrez,

The Honorable Marco Hernandez, is in possession of medical documentation involving Andrea Olson, and it is suggested that you are aware of the information contained in the documents. In following up to the most recent letter provided on October 28, 2016, Ms. Olson's absence from legal proceedings continues to be medically necessary and I do not have an estimated date as to when she will be able to proceed. She is currently in a clinically necessary intensive outpatient treatment program that is conducted Monday through Saturday, 8:30 AM to 4:30 PM.

Please take the information contained in this letter and prior documents into consideration.

Sincerely,

A handwritten signature in black ink that reads "Brian Becker Broncheau". The signature is written in a cursive, flowing style.

Brian Becker-Broncheau, M.D.

Cc: Honorable Marco Hernandez; 3:15-CV-2216-HZ viua fax 503-326-8219



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**THE UNITED STATES DISTRICT COURT**  
**DISTRICT OF OREGON**

**ANDREA OLSON**

**Case No. 3:15-cv-02216-HZ**

**Plaintiff**

**UNOPPOSED MOTION FOR**  
**EXTENSION OF EXPERT DISCLOSURE**

**v. DEADLINE**

**V.**

**UNITED STATES OF AMERICA, by**  
**and through the Department of Energy**  
**and Bonneville Power Administration;**  
**and JAMES RICHARD PERRY,**  
**Secretary of the Department of Energy,**

**Defendants**

Andrea Olson, the Plaintiff respectfully moves for a Twenty Seven day extension to the Expert Disclosure deadline, from Novemeber 5, 2017 to December 1, 2017. One of Ms Olsons POA's Dana Hoffman who is assisting and acting on Ms. Olsons behalf has conferred with James E Cox Jr, Assistant United States Attorney for the Federal Defendants. Mr. James E Cox Jr has informed Ms. Olson / Plaintiff and her POA/Ms. Hoffman that the Federal Defendants do not oppose this motion.

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On July 2017, the Court set a case schedule that included a Expert Disclosure cut-off of November 5 2017. (ECF 87) Due to the Defendants' Counsel Mr. James E Cox Jr's lengthy paternity leave, and one of the Plaintiff/Ms. Olsons POA's/Ms. Hoffman having an unscheduled surgery, the parties conferred and agreed to ask this court for an extension that would fall on the same date as the extension for the discovery deadline as to not delay any future deadlines that have already been scheduled as of July 2017.

An additional 27 day extension of the current Expert Disclosure deadline to December 1, 2017 will allow for no delays to the case schedule that was put into order in July 2017.(ECF 87)

Furthermore, an extension would not result in any delay in trial or other pre-trial deadlines, as the deadline for dispositive motions is not until December 4, 2017. (ECF 87) With the exception of the Expert Discovery due on November 5, 2017 which both parties have agreed upon would be due the same date December 1, 2017 as the discovery deadline date that we are asking for in this motion, therefore there still would not be a delay on any other deadlines that have been scheduled.

**WHEREFORE**, Ms. Olson /Planitiff respectfully requests that the Court grant this unopposed motion to extend the Expert Disclosure deadline in this case from Novemeber 5, 2017 to December 1, 2017.

Dated this 31st day of October 2017

Respectfully Submitted,



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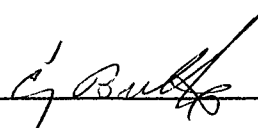
Plaintiff /Andrea Olson

3404 SW Comus St

Portland, Oregon, 97219

(503) 452-8888

andrea.olson8888@gmail.com



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Craig Butler/POA for Plaintiff Ms. Olson

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**CERTIFICATE OF SERVICE**

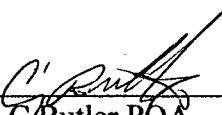
On October 31, 2017, I, Andrea Olson, Plaintiff, am serving a Second Unopposed Motion For An Extension to File Discovery v. Deadline and Unopposed Motion For an Extension to File Expert Disclosure v. Deadline through a representative to the following:

***Hand-delivered:***

Honorable Marco A. Hernandez  
Mark O. Hatfield United States Courthouse  
Room 1427  
1000 Southwest Third Avenue  
Portland, OR 97204-2944

James E. Cox, Jr., Esq.  
United States Attorney's Office (current medical documentation was also hand-delivered on Oct. 25, 2017)  
Assistant United States Attorney  
1000 SW Third Ave., Suite 600  
Portland, OR 97204

  
\_\_\_\_\_  
Andrea Olson

  
\_\_\_\_\_  
C Butler POA